



## South Coast Air Quality Management District

# Engineering & Compliance

*Policies &  
Procedures*

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### SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

#### MEMORANDUM

**DATE:** June 12, 1987  
**TO:** Engineering Division  
**FROM:** William J. Dennison, Acting Director of Engineering /s/ WJD  
**SUBJECT:** Permit Conditions

The recent ARB/EPA audit found that some permits contain conditions which are obsolete, in conflict with other conditions or a prohibitory rule, difficult to understand or enforce and do not always have sufficient restrictive requirements to ensure proper operation. Many permits to operate, particularly for source under equivalency, did not have sufficient conditions to verify or ensure continuous compliance. More specifically, they found...

1. Insufficient consideration given to enforceability when preparing permit conditions.
2. Inconsistent application of unit standard conditions and additional conditions.
3. Incomplete conditions or no conditions at all in 90 - 95 percent of the revised permits.
4. Record keeping requirements inconsistently applied.
5. Inconsistent transferring of review assumptions to permit conditions.

While I trust all the comments and findings do not represent our typical permit processing, there is still room for improvement.

Therefore, it shall be the policy of this Division in preparing permit conditions to ...

1. Prepare all permit conditions in a form which is completely unambiguous, understandable and readily enforceable. It should be a condition that the applicant can understand and comply with and the inspector can understand, enforce and easily monitor for compliance.
2. Employ standard conditions where possible.
3. Require record keeping when it is appropriate to determine compliance. The condition will state that the records are to be maintained in a format approved in writing by the Director of Enforcement. They are to be maintained for a period not less than two years and will be available to District personnel upon request.

4. Ensure that all permit conditions assumed in the analysis are transferred to the permit. For example, if the hours of operation, daily emissions or solvent content were used to determine compliance with the rules and regulations or to determine the NSR level, they will also be incorporated into the conditions.
5. Prepare permit conditions that ensure continuous compliance.
6. Review and update as appropriate standard conditions on a unit basis.

ep

Attachment\*

cc: E. Camarena

\*Attachment not available